

Kathleen R. Thomas, Esq.
kat@tlclawllc.com
Ph: 917-209-6446
Admission: NY, EDNY,
SDNY, WDNY, NDNY



Thomas Legal Counselors at Law, LLC
One World Trade Center, 85th Fl., Ste. 8500
New York, NY 10007
www.tlclawllc.com
Ph: 917-508-9698 | Fax: 917-591-3335

Ellie Silverman, Esq.
Of Counsel to TLC
ellie@tlclawllc.law
Admission: NY, NJ,
EDNY, SDNY

By ECF

October 12, 2023

Hon. Naomi Reice Buchwald
United States District Court Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

RE: RINA OH n/k/a RINA OH AMEN v VIRGINIA L. GIUFFRE, Case No.: 1:21-cv-08839-NRB

Your Honor:

Counsel for Defendant VIRGINIA L. GIUFFRE, respectfully submits this letter, on consent, as a joint status report.

The parties have amicably engaged in fact discovery and expert discovery. As for the parties exchange of document discovery, this is complete. Depositions of party and non-party witnesses are complete. However, as discussed below, some non-party document discovery is still outstanding. Plaintiff's affirmative expert reports were served on Defendant on August 11, 2023. Defendant served Plaintiff the expert report of Tobias Czudej on October 11, 2023.

Both party IME's are complete. However, Defendant's emotional damages expert had limited availability to schedule Plaintiff's IME and continued IME. As a result, one Defendant expert report has not been served.

Parties are also seeking additional time to complete non-party discovery sought pursuant to subpoenas. Plaintiff served a subpoena on Random House for the source material referenced in a footnote of the book. Random House has affirmatively denied that it is in possession of the source material. Plaintiff will be subpoenaing Sharon Churcher, who conducted a series of interviews with defendant, which are referenced in the "The Spider." The subpoena will be limited to one quote referenced in the book in an attempt to avoid a motion to quash citing New York's shield law and "First Amendment reporter's privilege."

In addition, Plaintiff was unable to access her Twitter accounts that are at issue in this defamation action. Despite due diligent efforts, The parties is still in the process of obtaining access to the accounts.

As such, the parties respectfully request a brief extension of time to complete expert discovery to November 17, 2023.

Respectfully submitted,

 /s/
Kathleen R. Thomas, Esq.

Jillian Roth, Esq.

CC via ECF:
Alexander M. Dudelson, Esq.